

BOSWORTH LAW

By: THOMAS E. BOSWORTH, ESQ.
Attorney I.D. No. 323350
123 South Broad Street, Suite 2040
Philadelphia, PA 19109
(267) 212-4177
tom@tombosworthlaw.com

TANYA MCCARTNEY and MARK MONTGOMERY, Individually and as Administrators of the ESTATE OF KAIDON A. MONTGOMERY,

Plaintiffs,

v.

KIDS 2, INC. f/k/a KIDS II, INC.; and KIDS 2, INC. d/b/a, t/a, a/k/a INGENNUITY

Defendant.

CIVIL ACTION NO.: 3:21-CV-166

JURY TRIAL DEMANDED

THOMAS E. BOSWORTH, ESQ.’S MOTION FOR LEAVE TO FILE REPLY BRIEF TO DEFENDANT’S REPLY BRIEF IN SUPPORT OF DEFENDANT’S MOTION FOR SANCTIONS

1. Defendant’s Motion for Sanctions is scheduled for a hearing on May 2, 2023, at 2:30 p.m.
2. On March 30, 2023, Defendant filed a Reply to Thomas E. Bosworth, Esq.’s Response in Opposition to Defendant’s Motion for Sanctions (ECF No. 105).
3. Thomas E. Bosworth, Esq. respectfully requests leave of this Court to file a Reply to Defendant’s March 30, 2023 Reply, which is attached hereto as Exhibit “A.”

Respectfully submitted,

/s/ Thomas E. Bosworth

THOMAS E. BOSWORTH, ESQ.

CERTIFICATION OF SERVICE

I, Thomas E. Bosworth, Esq., counsel for the plaintiff, hereby certify that Thomas E. Bosworth, Esq.'s Motion for Leave to File a Reply Brief in Response to Defendant's Reply Brief in Support of Defendant's Motion for Sanctions was served upon all parties through their counsel of record through the Court's e-notification system.

Date: 5/2/23

/s/ Thomas E. Bosworth
THOMAS E. BOSWORTH, ESQ.